1 [Submitting counsel below] 2 3 UNITED STATES DISTRICT COURT 4 NORTHERN DISTRICT OF CALIFORNIA 5 SAN FRANCISCO DIVISION 6 7 IN RE: UBER TECHNOLOGIES, INC., No. 3:23-md-03084-CRB 8 PASSENGER SEXUAL ASSAULT LITIGATION DECLARATION OF ROOPAL P. LUHANA 9 IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE PTO NO. 2 AND TO 10 COMPEL DEFENDANTS TO PRODUCE LITIGATION HOLD AND 11 PRESERVATION INFORMATION 12 This Document Relates to: Judge: Honorable Charles R. Breyer Date: January 19, 2024 13 Time: 10:00 AM All Cases Courtroom: 6 – 17th Floor (by Zoom) 14 15 16 I, Roopal P. Luhana, declare and state as follows: 17 1. I am an attorney and partner at Chaffin Luhana LLP, counsel for Plaintiffs and 18 Court-appointed Co-Lead Counsel in this action. I am a member in good standing of the State 19 Bars of New York, New Jersey, and Pennsylvania, and am admitted pro hac vice in this 20 coordinated action. I make this declaration based on my own personal knowledge. If called upon 21 to testify, I could and would testify competently to the truth of the matters stated herein. 22 2. I submit this Declaration in support of Plaintiffs' motion to enforce PTO No. 2 and 23 to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively 24 "Uber") to produce litigation hold and preservation information. 25 3. On November 17, 2023, Plaintiffs' Counsel met and conferred with Defendants' 26 counsel regarding concerning the steps Uber has taken to preserve potentially relevant ESI, and 27 the discovery of such, per the Court's November 3, 2023 Order (PTO No. 2) (ECF No. 65). 28

1	4.	On December 11, 2023, the parties met and conferred about this Motion. There
2	were subsequent emails exchanged between counsel about the same on December 12 and 13,	
3	2023.	
4	5.	Filed Under Seal as Exhibit A is a true and correct copy of a December 1, 2023
5	Letter from Uber to Plaintiffs.	
6	6.	Filed Under Seal as Exhibit B is a true and correct copy of a December 13, 2023
7	Email from Defendants to Plaintiffs.	
8	7.	Filed Under Seal as Exhibit C is a true and correct copy of a November 22, 2023
9	Letter from Plaintiffs to Defendants.	
10	8.	Filed Under Seal as Exhibit D is a true and correct copy of a December 12, 2023
11	Email from Defendants to Plaintiffs.	
12	I declare under penalty of perjury that the foregoing is true and correct. Executed on	
13	December 14, 2023, in New York, New York.	
14		By: /s/ Roopal P. Luhana
15		Roopal P. Luhana
16		CHAFFIN LUHANA LLP 600 Third Avenue, 12th Floor
17		New York, NY 10016 Telephone: (888) 480-1123
18		Facsimile: (888) 499-1123 luhana@chaffinluhana.com
19		Co-Lead Counsel for Plaintiffs
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